

7F 1904 or 76-1903 OK

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: November 10, 1977

SUBJECT: Glyphosate in or on alfalfa, TB comment on CB memo of August 19, 1977

FROM: TB/RD

TO: Mr. R. Taylor, PM

PP No. 7F1904

Monsanto Co
St. Louis, Mo.

In its memo (see title, above), CB defers to TB on significance of levels of N-nitrosoglyphosate which they estimate may occur in glyphosate-treated commodities or, secondarily, in edible animal products. TB has taken note of such data in review of some temporary tolerance requests for glyphosate (e.g., PP No. 6G1757, TB memo of 9/12/77). TB also reviewed TOX data on N-nitrosoglyphosate submitted by Monsanto (comprising oral LD₅₀, Younger Lab.; mouse dominant-lethal mutagenicity study, Ind. Bio-Test; hamster carcinogenicity^{study}, 6-month status, Bio/dynamics; and rabbit teratologic study, Ind. Bio-Test) in our memo of 10/4/77, this petition and ten others. We noted therein that we have not recommended, and do not intend ^{to recommend} for either permanent glyphosate tolerances or registration based on those data.

We emphasize, one of the above-mentioned ^{studies} is incomplete. One was judged unacceptable, and questions were raised about another. Two studies were performed by Industrial Bio-Test.

Finally, we understand that EPA has an in-house committee which will be concerned in evaluation of permanent tolerances (or registration) on nitrosamine- (or possible nitrosamine-) containing pesticides.

11/10/77
Mary L. Quaife, Ph.D., TB/RD

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